



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

DJ:AE  
F. #2021R00827

*271 Cadman Plaza East  
Brooklyn, New York 11201*

August 26, 2022

BY E-MAIL AND ECF

The Honorable Raymond J. Dearie  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Jian Ai Chen, 21 CR 494 (RJD)

Dear Judge Dearie:

The government writes in connection with the defendant's contemplated request to withdraw her guilty plea. At the status conference on March 3, 2022, the Court set a schedule for the defendant to file a motion to withdraw her guilty plea by April 13, 2022. Following that conference, counsel for the defendant provided the government with a two-hour audio recording in Cantonese that counsel represented would be relevant to this issue. However, the government had not been able to obtain a certified transcription and translation of the recording, based in part on the length and language of the recording. The Court revised the schedule on May 13, 2022, and July 11, 2022, the Court again revised this schedule, directing the government to update the Court and the defendant as to the status of the issue by August 26, 2022. Since the government's July 1, 2022 status letter, the government has secured a new translation service for this project and the translation of this recording is ongoing. Accordingly, the government respectfully requests an extension of at least 30 days to allow for the government to obtain this transcription and translation and confer with defense counsel to determine if there are issues in

dispute. The government has conferred with counsel for the defendant, who joins in this request.

Respectfully submitted,

BREON PEACE  
United States Attorney  
Eastern District of New York

LORINDA I. LARYEA  
Acting Chief  
Criminal Division, Fraud Section  
U.S. Department of Justice

By: /s/ Andrew Estes  
Andrew Estes  
DOJ Trial Attorney  
Criminal Division, Fraud Section  
U.S. Department of Justice  
718-254-6250

cc: Counsel of Record (ECF)